UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DHannemann:dh/OPPT-NPCD-FOB/24June1999/7404/260-3961/ET835J:C:\WP\Letter\Letters/ECS-Balst.wpd\
File:FOB CHRON-READING;/Ltr. to Christina Dolan, Environmental Strategies Corp., Reston, VA
RE: Fluorescent Light Ballasts, Storage for Disposal, PCB Small Capacitors, PCB Articles, PCB Items

JUN 28 1999

Ms. Christina A. Dolan, Environmental Scientist
Environmental Strategies Corporation
11911 Freedom Drive, Suite 900
Reston, VA 20190

Dear Ms. Dolan:

This is in response to your letter dated 17 June 1999 asking how you must store fluorescent light ballasts at PCB concentrations ≥50 ppm prior to disposal. The answer to this question depends on whether the PCBs in the ballast are found in the potting material or in a small capacitor.

Flourescent light ballasts containing PCBs ≥50 ppm only in an intact and non-leaking PCB Small Capacitor are regulated for disposal under §761.60(b)(2)(ii). (See §761.50(b)(2)(i).) The intact and non-leaking PCB Small Capacitor in the ballast falls within the definition of "PCB Article" and "PCB Item". However, there are not time restrictions or storage requirements on the storage for disposal of intact and non-leaking PCB Small Capacitors, or on fluorescent light ballasts containing PCBs ≥50 ppm only in an intact and non-leaking PCB Small Capacitor. (See §761.60(b)(7).)

All other fluorescent light ballasts containing PCBs ≥50 ppm, i.e., ballasts containing PCBs in a non-intact or leaking PCB Small Capacitor or in potting material, are regulated as PCB bulk product waste (not as PCB Items). As such, you must store these ballasts in accordance with one of the following:

- In a PCB storage area meeting the requirements of 40 CFR 761.65(b)(1);
- In a RCRA permitted facility or other approved facility meeting the requirements of 40 CFR 761.65(b)(2);
- For 30 days in a temporary storage area meeting the requirements of 40 CFR 761.65(c)(1); or
- For 180 days in piles in accordance with 40 CFR 761.65(c)(9).

CONCURRENCES								
SYMBOL	7404	7404						
SURNAME	Hannemann	SIMONS for BANEY						
DATE	24 JUN 99	6/25/99						

EPA Form 1320-1A (1/90) Printed on Recycled Paper OFFICIAL FILE COPY

U.S. GOVERNMENT PRINTING OFFICE: 1997 516-124

If you have any further questions please contact David Hannemann of my staff at 202-260-3961 or via e-mail "hannemann.dave@epa.gov".

Sincerely,

John W. Melone, Director
National Program Chemicals Division

ESC

ENVIRONMENTAL STRATEGIES CORPORATION

11911 Freedom Drive • Reston, Virginia 20190 • (703) 709-6500 • Fax (703) 709-8505

June 17, 1999

Mr. John Melone
Director, National Program Chemicals Division
Office of Pollution Prevention and Toxics
U.S. EPA
Mail Code 7404
401 M Street, SW
Washington, DC 20460

Re: Storage Requirements for Spent Fluorescent Light Ballasts

Dear Mr. Melone:

Environmental Strategies Corporation (ESC) is requesting written clarification from the U.S. Environmental Protection Agency (EPA) on the appropriate storage method for spent fluorescent bulbs (ballasts) that are assumed to contain greater than 50 parts per million (ppm) polychlorinated biphenyls (PCBs). For example, if an industrial facility assumes that its spent fluorescent light ballasts contain 50 ppm or more of PCBs in the potting material, then what are the storage requirements for the spent fluorescent light ballasts?

ESC has reviewed the June 29, 1998, Federal Register, which addresses disposal requirements but not storage requirements for ballasts that contain greater than 50 ppm PCBs. ESC understands that ballasts that contain greater than 50 ppm PCBs are considered PCB bulk product waste. In addition, would a spent fluorescent ballast (assumed to contain 50 ppm or more of PCBs) also be considered a "PCB article" and, therefore, also a "PCB item"?

If a spent fluorescent light ballast is considered a PCB item (as well as a PCB bulk product waste), then it appears from the regulations that a facility would have four options for onsite storage: (1.) PCB storage area (40 CFR 761.65(b)(1); (2.) Resource Conservation and Recovery Act-permitted facility (40 CFR 761.65(b)(2); (3.) temporary 30-day storage area (40 CFR 761.65(c)(1); and (4.) 180-day storage area subject to the conditions specified at 40 CFR 761.65(c)(9).

ESC requests that the U.S. EPA verify that a spent light ballasts assumed to contain 50 ppm or more of PCBs may be considered a PCB item, and thus be stored in a manner consistent with one of the four options specified above. ESC requests that the U.S. EPA draft its response in written form to the following address: 11911 Freedom Drive, Suite 900/Reston, VA 20190. If possible, ESC requests that the letter be transmitted within two weeks from the date of this letter.

If you have any questions, do not hesitate to contact ESC at (703) 709-6500. Thank you for your time and assistance.

Sincerely yours,

Christina A. Dolan

Christina A. Dolan
Environmental Scientist

Q:\word\emerson\aud2000\PCBFOIA.doc